Case 5:11-cr-00872-RMW Document 23 Filed 07/13/12 Page 1 of 3

1	GEOFFREY A. HANSEN	
2	Acting Federal Public Defender VARELL L. FULLER	
3	Assistant Federal Public Defender 160 West Santa Clara Street, Suite 575	EÒËZŠÒÖÄÄÄ EFHEFŒ
4	San Jose, CA 95113 Telephone: (408) 291-7753	
5	Counsel for Defendant CORTEZ-PADILLA	
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8	IN THE UNITED STATES DISTRICT COURT	
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
	SAN JOSE DIVISION	
10	A DAMED OF A PEDICA	N GD 11 00072 DWW
11	UNITED STATES OF AMERICA,) No. CR 11-00872 RMW
12	Plaintiff,) STIPULATION AND []) ORDER CONTINUING HEARING DATE
13	vs.) AND EXCLUDING TIME UNDER THE) SPEEDY TRIAL ACT
14	JUAN CORTEZ-PADILLA,)
15	Defendant.	
16		
17	<u>STIPULATION</u>	
18	Defendant Juan Cortez Padilla, by and through Assistant Federal Public Defender Varell	
19	L. Fuller, and the United States, by and through Special Assistant United States Attorney	
20	Meredith Edwards, hereby stipulate that, with the Court's approval, the status hearing currently	
21	set for Monday, July 16, 2012, at 9:00 a.m., shall be continued to Monday, August 20, 2012, at	
22	9:00 a.m.	
23	The reason for the requested continuance is counsel for Mr. Cortez-Padilla's requires	
24	additional time to research and investigate issues related to the filing of one or more pretrial	
25	motions. Defense counsel respectfully request additional time to effectively prepare Mr. Cortez-	
26	Padilla's defense, and therefore respectfully requests a continuance of the status hearing	
	Stipulation and [] Order Continuing Hearing	1

Case 5:11-cr-00872-RMW Document 23 Filed 07/13/12 Page 2 of 3 1 previously set in this matter to August 20, 2012. 2 Accordingly, the parties agree that the time between July 16, 2012, and August 20, 2012, 3 may be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for 4 effective preparation by defense counsel. 5 6 Dated: July 12, 2012 7 Assistant Federal Public Defender 8 9 Dated: July 12, 2012 10 MEREDITH EDWARDS Special Assistant United States Attorney 11 12 13 14 15 [] ORDER 16 GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY 17 ORDERED that the hearing currently set for Monday, July 16, 2012, shall be continued to 18 Monday, August 20, 2012, at 9:00 a.m. 19 THE COURT FINDS that failing to exclude the time between July 16, 2012, and August 20, 2012, would unreasonably deny the defendant reasonable time necessary for effective 20 21 preparation, taking into account the exercise of due diligence. See 18 U.S.C. §§ 22 3161(h)(7)(B)(iv). 23 THE COURT FINDS that the ends of justice served by excluding the time between July 24 16, 2012, and August 20, 2012, from computation under the Speedy Trial Act outweigh the 25 interests of the public and the defendant in a speedy trial. 26 THEREFORE, IT IS HEREBY ORDERED that the time between July 16, 2012, and Stipulation and [] Order Continuing 2 Hearing

Case 5:11-cr-00872-RMW Document 23 Filed 07/13/12 Page 3 of 3

1	August 20, 2012, shall be excluded from computation under the Speedy Trial Act, 18 U.S.C. §
2	3161(h)(7)(A) and (B)(iv).
3	IT IS SO ORDERED.
4	IT IS SO ORDERED. Dated: THEG Notate The G
5	THE HONORABLE RONALD M. WHYTE United States District Judge
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Stipulation and [] Order Continuing Hearing